

FILED
US DISTRICT COURT
DISTRICT OF NEBRASKA

SEP 24 2021

OFFICE OF THE CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHASE BASS and KYLIE THOMPSON,

Defendants.

SEALED

4:21CR 3121

INDICTMENT

21 U.S.C. §§841(a)(1) and 841(b)(1)

18 U.S.C. § 924(c)(1)(A)

18 U.S.C. §§ 922(g)(1) and 924(a)(2)

18 U.S.C. §§ 922(d)(1) and 924(a)(2)

18 U.S.C. §§ 922(a)(6) and 924(a)(2)

The Grand Jury charges that

COUNT I

Between on or about March 18, 2021, and July 31, 2021, in the District of Nebraska, Defendant CHASE BASS did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 21, United States Code, Section 841(b)(1).

COUNT II

Between on or about March 18, 2021, and July 31, 2021, in the District of Nebraska, Defendant CHASE BASS did knowingly use and carry a firearm, during and in relation to, and did knowingly possess such firearm in furtherance of, a drug trafficking crime for which Defendant may be prosecuted in a court of the United States, that is, the offense described in Count I.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT III

Between on or about March 18, 2021, and July 31, 2021, in the District of Nebraska, Defendant CHASE BASS, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: Possess Machine Gun, Short Rifle or Shotgun and Possession of a Controlled Substance on or about January 15, 2019, in the District Court for Lancaster County at Case Number CR18-1063; and/or Possess Controlled Substance on or about January 15, 2019, in the District Court for Lancaster County at Case Number CR18-1061; knowingly possessed a firearm and ammunition which had been shipped and transported in interstate commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT IV

On, about, or between March 18, 2021, and July 31, 2021, in the District of Nebraska, KYLIE THOMPSON, Defendant herein, knowingly transferred a firearm to CHASE BASS, knowing and having reasonable cause to believe that CHASE BASS had been convicted of a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

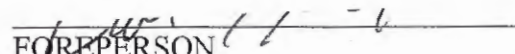
COUNT V

From on or about March 18, 2021, to on or about July 31, 2021, in the District of Nebraska, defendant KYLIE THOMPSON, in connection with the acquisition of firearms from Lincoln Scheels; Discount Enterprises LLC, aka Deguns.net Firearms Sales & Service; Randolph Jewelry; and AAA Ultimate Pawn; in Lancaster County, Nebraska; licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code; knowingly made a false and fictitious written statement to Lincoln Scheels; Discount Enterprises LLC, aka Deguns.net Firearms Sales & Service; Randolph Jewelry; and AAA Ultimate Pawn; which statement was

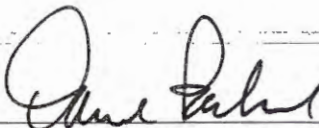
intended and likely to deceive Lincoln Scheels; Discount Enterprises LLC, aka Deguns.net Firearms Sales & Service; Randolph Jewelry; and AAA Ultimate Pawn; as to a fact material to the lawfulness of such attempted acquisition of a firearm to the defendant under chapter 44 of Title 18, in that Defendant KYLIE THOMPSON executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473; and 1) stated that she was the actual buyer of a firearm, when in fact as Defendant KYLIE THOMPSON then knew she was not the actual buyer of the firearm; and 2) stated that her current address was 2428 S. 10th St. Apt. 3, Lincoln, Nebraska, when in fact as Defendant KYLIE THOMPSON then knew that her current address was not 2428 S. 10th St. Apt. 3, Lincoln, Nebraska.

In violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A TRUE BILL.


FOREPERSON

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.


DANIEL PACKARD, #21991
Assistant U.S. Attorney